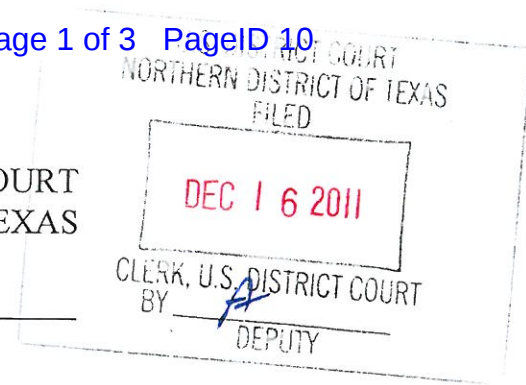


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA §
 §
v. § CRIMINAL NO. 3:11-mj-591
 §
PRINCE CHIEMELE NWANKUDU §

MOTION FOR DETENTION

The United States moves for pretrial detention of defendant, **PRINCE CHIEMELE NWANKUDU**, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156);
- ☐ Maximum sentence life imprisonment or death
- ☐ 10 + year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice
- ☐ Felony involving a minor victim
- ☐ Felony involving a firearm, destructive device, or any other dangerous weapon
- ☐ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

☒ Defendant's appearance as required

☐ Safety of any other person and the community

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against defendant because (check one or both):

☐ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

☐ Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)

☐ Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251

☐ Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

☒ At first appearance

☐ After continuance of 3 days (not more than 3).

DATED this 16th day of December, 2011.

Respectfully submitted,

SARAH R. SALDAÑA
UNITED STATES ATTORNEY



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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2011, I electronically filed the foregoing document with the Clerk of Court for the United States District Court for the Northern District of Texas using the electronic filing system of the Court. A copy of this motion will also be brought to the defendant's Initial Appearance.

/s/ J. Nicholas Bunch

J. NICHOLAS BUNCH
Assistant United States Attorney